



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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86 Chambers Street  
New York, NY 10007

June 20, 2025

**BY ECF**

The Honorable Andrew L. Carter, Jr.  
United States District Judge  
40 Foley Square  
New York, NY 10007

Re: *National Job Corps Association v. Dept. of Labor*, No. 25 Civ. 04641 (ALC)

Dear Judge Carter:

We write jointly on behalf of all parties in the above referenced matter in accordance with the Court's June 17, 2025, Order requiring the Parties to meet and confer and file a joint status report addressing the redactions made to the exhibits filed in support of Defendants' opposition brief, ECF No. 29. *See* ECF No. 54.

The information that has been redacted from Exhibits 1 and 2 to the Declaration of Jillian Matz, ECF No. 31, (with the exception of the signatures discussed below) is confidential business information of Plaintiff Adams and Associates, Inc., ECF No. 31-1, and Plaintiff Transportation Communications Union/IAM, ECF No. 31-2, which was redacted pursuant to the Trade Secrets Act, 18 U.S.C. § 1905. The Parties jointly request that the information remain redacted.

The Department of Labor ("DOL") has redacted the images of signatures of DOL Contracting Officers in Exhibits 1, 2, 6, 7, 8, and 9, ECF Nos. 31-1, -2, -6, -7, -8, pursuant to the Privacy Act, 5 U.S.C. 552a. The names of the DOL Contracting Officers signing those documents have not been redacted. The Government requests, and Plaintiffs consent, that the images of the signatures remain redacted to maintain the privacy interests of those individuals.

DOL has determined that the redactions at pages 1-2 of Exhibit 6, ECF No. 31-6, can be removed, and attached hereto is a replacement version of that document (with only the signature redacted on p. 4, as discussed above).

We thank the Court for its attention to this matter.

Respectfully,

JAY CLAYTON  
United States Attorney

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